

Federal Defenders OF NEW YORK, INC.

Southern District
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February 7, 2008

MEMO ENDORSED

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Charlotte Wallace
07 Cr. 1033 (RJS)

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/19/08

Your Honor:

Yesterday, following her entry of a plea of guilty to the above captioned information, the Court ordered Ms. Wallace's bail revoked with the condition that she surrender to the United States Marshals by 5 p.m. today. With the consent of the government, including the approval of Lauren Goldberg, the Chief of the Narcotics Division, we request that the Court modify its Order to permit Ms. Wallace to complete the residential portion of her drug treatment program before being remanded.

The present conditions of Ms. Wallace's bail include a \$100,000 personal recognizance bond signed by three persons and strict pre-trial supervision. On February 1, 2008, Pre-trial Services placed Ms. Wallace in a residential drug treatment program by Pre-trial Services. The program is operated by Daytop Village and is located in Rhinebeck, New York.

If the Court grants our request, Pretrial Services will arrange for Ms. Wallace to be returned to the Daytop Village program tomorrow morning, February 8, 2008.

In sum, we ask the Court to modify its Order regarding bail to provide that Ms. Wallace be permitted to complete her residential drug treatment program as directed by Pretrial Services. Upon completion, Ms. Wallace will be remanded. While she is in the drug treatment program,

Honorable Richard J. Sullivan
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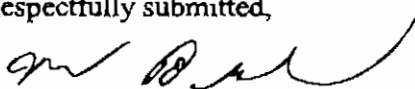
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all other conditions of her bail will remain in effect.

Thank you for your consideration of this matter.

Respectfully submitted,



Mark B. Gombiner
Attorney for Charlotte Wallace

cc: A.U.S.A. Julian Moore

Request denied. ~~that~~
Counsel and Ms. Wallace
are to appear before the court
at 4:30 pm. Counsel should be
prepared to discuss
the legality of
the requested
modification
under 18 USC
& 3143.

SO ORDERED
Dated: 2/7/08
RICHARD J. SULLIVAN
U.S.D.J.

